

SALANS

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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

**In re**

**LEHMAN BROTHERS HOLDINGS INC., *et al.***

**Debtors.**

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**Chapter 11 Case No.**

**08-13555 (JMP)**

**(Jointly Administered)**

**VERIFIED STATEMENT OF  
SALANS PURSUANT TO BANKRUPTCY RULE 2019**

Salans, a law partnership organized under the laws of the United Kingdom, submits this verified statement ("Verified Statement") pursuant to Rule 2019(a) of the Federal Rules of Bankruptcy Procedure in connection with the above-captioned Chapter 11 case of Lehman Brothers Holding Inc. (the "Debtor") and respectfully states as follows:

1. As of the date of this statement, Salans is advising the following Entities ("Entities") in connection with the above-captioned Chapter 11 case and/or the related adversary proceeding 08-01420 SIPC v. Lehman Brothers Inc. ("SIPC Proceeding"):

- (a) Svenska Handelsbanken AB (publ) ("SHB")  
875 Third Avenue, 4th Floor  
New York, NY 10022
- (b) Swedbank AB (publ) ("Swedbank")  
SE-105 34  
Stockholm, Sweden

- (c) Arab Bank plc (“Arab Bank”)  
520 Madison Avenue  
New York, NY 10022
- (d) Bank Pekao SA (“Pekao”)  
53/57 Grzybowska Street  
P.O. Box 1008  
00-950 Warsaw, Poland
- (e) GL Trade Americas, Inc (“GL Trade”)  
261 Madison Avenue  
16th floor  
New York, NY 10016
- (f) BNY ConvergeEx Group LLC (“BNY”)  
1633 Broadway  
48th Floor  
New York, NY 10019
- (g) Eze Castle Software (“Eze Castle”)  
1633 Broadway  
48th Floor  
New York, NY 10019
- (h) LiquidPoint LLC (“LiquidPoint”)  
1633 Broadway  
48th Floor  
New York, NY 10019

2. Each of the above named Entities were directly or through affiliates clients of the Firm prior to September 15, 2008. Each of the Entities has requested Salans to give them advice with respect to Lehman Brothers Holdings Inc. and/or one or more of its subsidiaries including Lehman Brothers Inc.

3. Salans does not hold any interests in, or position with respect to, any of the claims or interests held by the Entities with respect to either Lehman Brothers Holdings Inc. or Lehman Brothers Inc.

4. The claims and/or interests of each of the foregoing Entities in Lehman Brothers Holdings, Inc. or Lehman Brothers Holdings arose prior to September 15, 2008, by virtue of contracts, statutes, or common law rights and obligations.

5. The address of Salans for purposes of this statement is 620 5th Avenue, New York, New York, 10020.

6. Each of the Entities has separately requested that Salans advise them in connection with the above mentioned chapter 11 cases or SIPC Proceedings.

7. Neither this Verified Statement nor the filing of this Verified Statement shall operate as an appearance by any Entity nor is this submission intended to or be deemed to have submitted any Entity to this court's jurisdiction. Any such appearance in either the Chapter 11 cases or the SIPC Proceeding shall be done, if at all, by a separate and explicit notice of appearance or other pleading or proof of claim.

8. The undersigned hereby verifies under oath that this Verified Statement is true and accurate to the best of the undersigned's knowledge and belief. Salans reserves the right to revise and supplement this Verified Statement.

Dated: New York, New York  
October 3, 2008

SALANS

By: /s/ Claude Montgomery  
Claude Montgomery, Esq.  
Lee P. Whidden, Esq.  
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New York, New York 10020  
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